

1 THE HONORABLE ROBERT J. BRYAN
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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
AT TACOMA

10 NINA J. BUJACICH,)
11 Plaintiff,) No. C13-5854-RJB
12 v.)
13 TYLER TECHNOLOGIES, INC., as Plan)
Administrator and Sponsor; and TYLER)
TECHNOLOGIES SHORT TERM)
DISABILITY COVERAGE,)
14 Defendants.)
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STIPULATION AND ORDER FOR
CONTINUANCE OF DEADLINE
FOR RESPONDING TO
COMPLAINT
NOTE ON MOTION CALENDAR:
MONDAY, OCTOBER 28, 2013

STIPULATION

Plaintiff Nina Bujacich (“Plaintiff”) and Defendants Tyler Technologies, Inc. (“Tyler”) and Tyler Technologies Short Term Disability Coverage (the “Plan”) (collectively “Defendants”), hereby stipulate to a brief extension of Defendants’ deadline to answer or otherwise respond to Plaintiff’s Complaint.

The parties have good reason to request a brief extension pursuant to Western District Local Rule CR 10(g) for the following reason: In an effort to explore a potential resolution of this matter without involving the Court and without engaging in the additional expense of drafting pleadings or motions, the parties have agreed to participate in early settlement negotiations. To facilitate these discussions, the parties find it necessary to request a brief extension of the responsive deadline, as follows:

STIPULATION AND ORDER- 1
No. C13-5854-RJB
121731.0002/5861876.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4100
SEATTLE, WASHINGTON 98101-2338
206.223.7000 FAX: 206.223.7107

1 **CURRENT SCHEDULE**

2 Defendants must file an answer or otherwise
3 respond to the Complaint by: **October 29,
2013**

4 No scheduling order has been entered and the brief extension will not impact the
5 efficient proceeding of this litigation should a resolution not be reached.

6 DATED this 28th day of October, 2013.

7 LANE POWELL PC

8 By s/Sarah E. Swale
9 Sarah E. Swale, WSBA No. 29626
10 Kelly M. Turner, WSBA No. 43022
11 Attorneys for Defendants

1 **PROPOSED REVISED SCHEDULE**

2 Defendants must file an answer or otherwise
3 respond to the Complaint by: **November 19,
2013**

4 TODD R. RENDA, ATTORNEY AT LAW

5 By s/Todd R. Renda
6 Todd R. Renda, WSBA No. 13542
7 Attorneys for Plaintiff

12 **ORDER**

13 IT IS SO ORDERED.

14 DATED this _____ day of _____, 201__.

15 The Honorable Robert J. Bryan
16 UNITED STATES DISTRICT JUDGE

17 PRESENTED BY:

18 LANE POWELL PC

19 By s/Sarah E. Swale
20 Sarah E. Swale, WSBA No. 29626
21 Kelly M. Turner, WSBA No. 43022
22 Attorneys for Defendants

23 STIPULATION AND ORDER- 2
24 No. C13-5854-RJB

25 121731.0002/5861876.1

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 SEATTLE, WASHINGTON 98101-2338
 206.223.7000 FAX: 206.223.7107

1 APPROVED; NOTICE OF PRESENTATION WAIVED:

2 TODD R. RENDA, ATTORNEY AT LAW

3
4 By s/Todd R. Renda
5 Todd R. Renda, WSBA No. 20779
6 Attorney for Plaintiff

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STIPULATION AND ORDER- 3
No. C13-5854-RJB
121731.0002/5861876.1

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CERTIFICATE OF SERVICE

Pursuant to RCW 9.A.72.085, the undersigned certifies under penalty of perjury under the laws of the State of Washington and the United States, that on the 28th day of October, 2013, the document attached hereto was presented to the Clerk of the Court for filing and uploading to the CM/ECF system. In accordance with their ECF registration agreement and the Court's rules, the Clerk of the Court will send e-mail notification of such filing to the following:

Todd R. Renda
Attorney at Law
6314 19th Street West, Suite 21
Tacoma, WA 98466-6233
Email: toddrenda@msn.com

DATED this 28th day of October, 2013, at Seattle, Washington.

s/ Lorrie A. Salinas
Lorrie A. Salinas

**STIPULATION AND ORDER- 4
No. C13-5854-RJB
121731.0002/5861876.1**

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